

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Phillip Raymond  
McCalla Raymer Leibert Pierce, LLC  
485F US Highway 1 S  
Suite 300  
Iselin, NJ 08830  
Telephone: (732) 902-5399  
NJ\_ECF\_Notices@mccalla.com  
Attorneys for Movant

In Re:

Mark A Downing  
dba Downing Trucking

Case No.: 19-25219-ABA

Adv. No.: \_\_\_\_\_

Chapter: 13

Hearing Date: August 23, 2022

Judge: Andrew B. Altenburg Jr.

**ADJOURNMENT REQUEST FOR CHAPTER 13**

1. I, Phillip Raymond,
- ☒ am the attorney for: Chase Mortgage Holdings, Inc. s/b/m to JPMC Specialty Mortgage LLC
- ☐ am self-represented
- Phone number: 732-902-5399
- Email address: NJ\_ECF\_Notices@mccalla.com

2. I request an adjournment of the following hearing:

Matter: Motion for Relief from Stay (ECF No. 60)

Current hearing date and time: August 23, 2022 at 10:00 a.m.

New date requested: September 27, 2022 at 10:00 a.m.

Reason for adjournment request: Settlement discussions

3. I request an adjournment of confirmation:

Current confirmation date and time: \_\_\_\_\_

New date requested: \_\_\_\_\_

Reason for adjournment request: \_\_\_\_\_

Confirmation has been adjourned \_\_\_\_\_ previous times

Trustee payments are current through \_\_\_\_\_

The meeting of creditors under § 341(a) of the Code ☐ was conducted ☐ was not conducted

4. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

I certify under penalty of perjury that the foregoing is true.

Date: August 19, 2022

/s/ Phillip Raymond

Signature

**Pursuant to D.N.J. LBR 5071-1(b) an adjournment request must be made not later than 3 days before the hearing.**

**NOTE: THIS FORM MUST BE SUBMITTED TO THE CHAPTER 13 TRUSTEE, AND IS NOT REQUIRED WHEN SEEKING THE ADJOURNMENT OF A 341(a) MEETING OF CREDITORS.**

**OFFICIAL USE ONLY:**

The request for adjournment is:

☒ Granted New hearing date: 9/27/22 @ 10 A.M. ☐ Peremptory

☐ Granted over objection(s) New hearing date: \_\_\_\_\_ ☐ Peremptory

☐ Denied

**IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.**

rev.10/1/15